

5 June 2006

Madison County Board of Commissioners
PO Box 278
Virginia City, Montana

Dear Chairman Coffman:

As you are no doubt aware, the US Department of Homeland Security established the National Incident Management System (NIMS) in March 2004. A subsequent Presidential Directive, entitled "Management of Domestic Incidents", requires all federal agencies to adopt and implement NIMS while also requiring state and local jurisdictions to implement NIMS in order to receive federal preparedness funding. The deadline for compliance with this mandate was later set as September 30, 2006.

Using the attached compliance matrix (Enclosure (1) as a guide, the Madison County Local Emergency Planning Committee (LEPC) undertook a careful and detailed assessment of the county's compliance with these federal directives; with Madison County Resolution 18-2005 and with the recently approved (Resolution 6-2006) county Disaster and Emergency Plan. The detailed results are attached as enclosure (2) which was approved by unanimous vote of the LEPC on 18 May 2006.

Summarizing the findings contained in Enclosure (2), I would say that Madison County is making good progress towards full NIMS compliance and should therefore be eligible for any federal preparedness funding which might be identified. Two particular problem areas mentioned in the LEPC assessment are worthy of note, only one of which is amenable to local action. The first is that while full adoption of the Incident Command System (ICS), a fundamental part of NIMS, is proceeding, it is doing so more slowly than might be preferred. Old habits die hard, however, and cannot be expected to change overnight, particularly in the case of a virtually all volunteer force of responders. Training is being conducted vigorously and, as the flexibility and capabilities of ICS are becoming better understood, progress is being made. The LEPC feels that, while less than desirable, the county is making acceptable progress in integrating ICS into routine planning, response and recovery efforts.

The second concern relates to lag in determining and promulgating comprehensive equipment and qualification standards by the federal government. At the present time, the public safety planning and response agencies in Madison County, under the guidance of the county Department of Emergency Management, are endeavoring to comply in so far as these standards are known or can be inferred. No definitive documentation of these standards is known to exist, however. At present this is not felt to be a significant problem, but it will bear watching in future months by the LEPC and the various county entities involved in public safety and emergency planning.

Yours Truly,

Lewis Stahl
Chairman

Enclosures (2)

MADISON COUNTY NIMS ASSESSMENT

Prepared by the Madison County Local Emergency Planning Committee

18 May 2006

Community Adoption

Madison County Resolution 18-2005 of August 2005 adopted NIMS as the county all-hazards incident response and planning system. This was reinforced by Madison County Resolution 6-2006, which adopted the Madison County Disaster and Emergency Plan and also states that "...the National Incident Management System (NIMS) must be incorporated into all emergency management planning, policy and procedural matters undertaken within the county." That self same Disaster and Emergency Plan also states that "The intent of this document...is to implement and remain fully compliant with NIMS..."

The LEPC has undertaken the status assessment and development of the necessary strategy for full NIMS compliance and maintenance. This document is the result of that assessment.

Command & Management

ICS terms and definitions have been largely institutionalized and are called for in the County Disaster and Emergency Plan. Procedural documents, SOPs, etc. of the individual volunteer agencies largely incorporate ICS concepts, however additional work is necessary, particularly in the area of training and exercising using ICS concepts.

Contemporary plans and SOPs at the county level have been revised and updated to incorporate NIMS principles.

While there is an awareness of the need to incorporate better planning and preparedness for the provision of public information during an incident, this has yet to be addressed in formal county planning. A PAO/PIO Annex to the Disaster & Emergency Plan has yet to be developed. The Emergency Management Director anticipates completion of such an annex by the end of summer. The CCC program is attempting to find CERT graduates who would be interested in augmenting the public safety responder infrastructure as PIO officers and/or staff during times of crisis or incident.

Preparedness: Planning

The LEPC has assessed where the county stands vis-à-vis NIMS implementation. This document is the result of that assessment. County emergency planning documents currently fully support NIMS compliance throughout the spectrum of county regulated or influenced activity. SOPs of some of the individual agencies involved are in need of updating to specifically speak of NIMS and ICS, however they are generally supportive of the concepts involved. The Madison County Sheriff's Office is noted as being actively involved in incorporating such procedural information in their SOPs and attendant training.

The exact requirements for mutual aid agreements within the state have not been precisely determined in light of recent legislation. Certainly the need for such documentation has become less critical in recent years. Nevertheless, the Department of Emergency Management is actively pursuing the goal of having such agreements with all private entities which can be identified with the intent of pursuing the goal of having all necessary mutual aid agreements in place before the end of this year.

Preparedness: Training

All responders, emergency planners and other personnel who might play a direct role in emergency preparedness need to complete IS 700 "NIMS, an Introduction"; IS 800 "NRP, an Introduction" and ICS 200 "Basic ICS" training. Compliance can be accomplished on line, however the county is sponsoring

the first of several IS 700/ICS 200 courses on 3 June 2006 and plans to conduct more such training as summer draws to a close.

Preparedness: Exercises

NIMS/ICS has been incorporated into most training and all exercises conducted by county agencies. An all-hazard exercise incorporating these principles and involving multiple disciplines and jurisdictions was held in Oct 05 centered on a multiple casualty car wreck near Jeffers. ICS utilization was a significant item of post exercise comment. A multiple discipline table top exercise involving pandemic flu or a related bio-health incident has been tentatively planned for early this summer under the aegis of the county Public Health Department.

Resource Management

National determination of equipment standards has lagged and, at this writing, little definitive information has been promulgated. Nevertheless, every effort is being made to incorporate these standards, in so far as they can be determined, in all procurement. This is particularly notable in the area of public safety communications wherein all procurements by the county since the establishment of the Interoperability Montana initiative have been guided by the standards set forth by that program.

Communications & Information Management

The principle thrust of this sub-category relates to the use of standardized and consistent terminology, notably plain English, across the entire public safety sector. While effort has been initiated to comply with these provisions and to reduce reliance on '10' codes, more must be done. The Madison County Sheriff's Office, under whose supervision dispatch and public safety communications are primarily conducted is initiating a program aimed at achieving this goal by fall 2006.

NATIONAL INCIDENT MANAGEMENT SYSTEM (NIMS)

COMPLIANCE REQUIREMENTS

(13 April 2006)

Community Adoption

- Adopt NIMS (Madison County resolution 18-2005 of 18 Aug 05)
- Assess status & develop strategy for full NIMS compliance & maintenance
- Use NIMS Capability & Assessment Support Tool & sample templates from www.fema.gov/nims as appropriate.

Command & Management

- Institutionalize ICS Terms and definitions (Ref: www.fema.gov/txt/nims/institutionalizing_ics.txt)
- Incorporate concepts & principles of NIMS Command & Management, including ICS characteristics & methodology
- Revise & update processes & plans to incorporate NIMS Command & Management principles.
- Develop & maintain connectivity capability between local ICPs, 911 centers, local EOCs and state EOC.
- Implement public information processes, procedures and plans to communicate timely, accurate information to the public during an incident through a Joint Information System and Joint Information Center.

Preparedness: Planning

- Assess where the county stands vis-à-vis NIMS implementation
- Develop & implement system to coordinate federal preparedness funding to implement NIMS across the community
- Revise and update plans & SOPs to incorporate NIMS components, principles & policies, including planning, training, response, exercises, etc.
- Participate in and promote intrastate and interagency mutual aid agreements, to include agreements with the private sector and non-governmental organizations.

Preparedness: Training

- All personnel with direct role in emergency preparedness, incident management or response complete IS 700 “NIMS: An Introduction”
- Complete IS 800 “NRP: An Introduction” as required by www.fema.gov/nims
- Complete ICS 100 and ICS 200 Training as required by www.fema.gov/nims

Preparedness: Exercises

- Incorporate NIMS/ICS into all local & regional training and exercises
- Participate in an all-hazard exercise program based on NIMS that involves multiple disciplines & multiple jurisdictions
- Incorporate corrective actions into preparedness & response plans & procedures (Ref: www.fema.gov/pdf/nims & www.ojp.usdoj.gov/odp/exercises.htm)

Resource Management

- Inventory community response assets to conform to homeland security resource typing standards as defined by www.fema.gov/nims/mutual_aid.shtm

- Incorporate national standards & guidance to achieve equipment, communications and data interoperability into local acquisition programs. .

Communication & Information Management

- Apply standardized and consistent terminology, including the establishment of plain English communications standards across public safety sector
- Revise field manuals and training to reflect the plain English standard
- Although '10' codes may continue to be used during non-emergency, internal department communications, incident response communications must feature plain English commands and common terminology for all response activities

NOTE: Compliance activities deadline is 30 September 2006. “Future refinement to the NIMS will evolve as policy and technical issues are further developed and clarified at the national level. This may well result in additional requirements....”